

# **EXHIBIT A**

Shapiro - Argument

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1 manager, and that's part of the DIP loan. But, I just want to  
2 emphasize it became that manager ten minutes before we went  
3 into bankruptcy.

4 On slide two, Your Honor, we have before we do  
5 anything today. This represents only CIT currently, and  
6 Textron and J.P. Morgan Chase are the lenders. And, from this  
7 chart, you can see Ben, Shapes, and the operating entities at  
8 the bottom.

9 The current facility is consisted to on the left  
10 where you have a revolving credit line, inventory receivables,  
11 your standard type of thing. You have a letter of credit  
12 facility which has been raised that has to -- ongoing,  
13 especially with foreign suppliers.

14 And, the third part is a term loan. They've been in  
15 existence since 2003. So, it's not a new loan that's been put  
16 on. All the borrowers have been borrowing for years, and they  
17 have a lien on all of the assets of the estate.

18 Now, slide three. Slide three is what we are getting  
19 to today to ask you what we are to do for today. And, we are  
20 asking you to do a lot today. But, it goes with slide four.  
21 We have the debtors which are in the middle of the slide  
22 essentially for the U.S. Trustee, which is all of them. And,  
23 we're going to have two facilities on either side of the  
24 debtor, and they have to read together.

25 You've got the CIT facility, which we are requesting